

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JACQUELYN CARPENTER,)	CASE NO. 2:21-cv-00568
)	
Plaintiffs,)	JUDGE SARAH D. MORRISON
)	
v.)	Magistrate Judge Chelsey M. Vascura
)	
SOUTHERN AIRWAYS EXPRESS, <i>et</i>)	
<i>al.</i> ,)	
)	
Defendants.)	

PLAINTIFF’S UNOPPOSED MOTION TO AMEND BRIEFING SCHEDULE

NOW COMES Plaintiff Jacquelyn Carpenter, through counsel, and, pursuant to Fed. R. Civ. P. 6(b) and this Court’s Local Rules, respectfully moves this Court to amend the briefing schedule in this case. Specifically, Plaintiff respectfully requests the Court extend her deadline to respond to Defendants’ Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue (Doc. No. 9) to June 9, 2021 and Defendants’ Reply thereafter to June 23, 2021.

As basis for this Motion, between the date Defendants filed their Motion and Plaintiff’s current response deadline (May 26, 2021), Plaintiff’s counsel has been preoccupied responding to dispositive motions in four other cases, and has participated in multiple depositions and several other court hearings and conferences. Due to this press of business, Plaintiff’s counsel has not had adequate time to prepare Plaintiff’s response to Defendants’ Motion, and he will not be able to do so by May 26, 2021.

Prior to filing this Motion, undersigned counsel conferred with defense counsel, and Defendants do not oppose this extension of time.

WHEREFORE, Plaintiff respectfully requests an extension until June 9, 2021 to file her response to Defendants' Motion to Dismiss, with Defendants' Reply due thereafter on June 23, 2021.

This is Plaintiff's first extension, and this Motion is not being made for the purpose of unnecessary delay.

Respectfully submitted,

/s/ Matthew G. Bruce

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CERTIFICATE OF SERVICE

I hereby certify that, on May 24, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Matthew G. Bruce

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